

DOCKETED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

BALLY MANUFACTURING CORPORATION, )  
 )  
 ) Plaintiff, )  
 )  
 ) v. )  
 )  
 ) CIVIL ACTION )  
 )  
 ) D. GOTTLIEB & CO., a corporation and )  
 ) WILLAIMS ELECTRONICS, INC., ) NO. 78C 2246  
 ) a corporation, )  
 )  
 ) Defendants. )

DEC 21 PM 4 33

CLERK  
U.S. DISTRICT COURT

NOTICE OF DEPOSITION

To: Donald L. Welsh, Esq.  
Fitch, Even, Tabin & Luedeka  
135 S. LaSalle Street  
Chicago, Illinois 60603

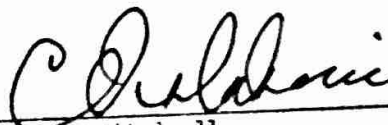
Melvin M. Goldenberg, Esq.  
McDougall, Hersch & Scott  
135 South LaSalle Street  
Chicago, Illinois 60602

Please take notice that the attorneys for Defendant,  
D. Gottlieb & Co., will take the deposition upon oral examination of  
Robert Jonesi, 108 Granada Avenue, Los Gatos, California 95030.  
The deposition will commence at 10:00 a.m., February 26, 1979  
at the office of RAMTEK CORPORATION, 585 N. Mary Avenue,  
Sunnyvale, California 94086, such deposition to continue from day to  
day until complete.

Furthermore, please take notice that Defendant,  
D. Gottlieb & Co., shall cause the U. S. District Court for the Northern  
District of California to issue a subpoena duces tecum commanding the  
witnesses to produce documents falling in the categories set out in  
Exhibit 1 attached hereto.

Date: \_\_\_\_\_

12/21/78



Leroy W. Mitchell

Charles S. Oslakovic

Dale Lischer

Leydig, Voit, Osann, Mayer & Holt, Ltd.

815 North Church Street

Rockford, Illinois 61103

815/963-7661

ATTORNEYS FOR DEFENDANT,

D. Gottlieb & Co.

CERTIFICATE OF SERVICE

This is to certify that the foregoing Notice of Deposition  
was served upon Plaintiff Bally and Defendant Williams by hand-delivery  
a copy, with Exhibit 1 attached, to their respective attorneys at the  
addresses set out in such Notice this 21<sup>st</sup> day of Dec, 1978.



EXHIBIT 1

1. All documents in your possession or control which refer to or relate to the creation, design, construction, testing, demonstrations and communications concerning

(a) a pinball game developed at Ramtek Corporation and now known as LUCKY DICE, and

(b) any pinball games employing, inter alia, a microprocessor and developed or worked on at Atari, Inc. prior to September 13, 1976.

--including without limitation notes, descriptions, drawings, circuit diagrams, drawing logs, correspondence, memos, purchase orders for parts, reference materials (e.g., data <sup>Sheets</sup> ~~chips~~ for integrated circuits manufactured by Intel), flow charts, program notes and listings, personnel time records, and photographs; and in particular relating to (i) conception, (ii) work toward reduction to practice of the first prototype, and (iii) reduction to practice and successful operation of the first prototype or physical embodiment.

2. All physical parts or components in your possession or control which were at anytime used in or on the pinball game now known as LUCKY DICE.

3. All documents in your possession or control constituting correspondence communications, or records reflecting oral communications, made prior to September 13, 1976

(a) between any employee or representative of Ramtek Corporation and any person or entity outside of the Ramtek Corporation organization in relation to the pinball game now known as LUCKY DICE, and

(b) between any employee or representative of Atari, Inc. and any person or entity outside of the Atari, Inc. organization in relation to pinball games employing, inter alia, a microprocessor, and developed or worked on at Atari, Inc.

4. All documents in your possession or control constituting correspondence communications, or records reflecting oral communications, made at anytime between you and any employee or representative of Bally Manufacturing Corporation or its subsidiaries --where such communications referred to or related to pinball games employing microprocessors, such games having been developed or worked on prior to September 13, 1976 by and at either Ramtek Corporation or Atari, Inc.